

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

Angela D. Douglas,	§	
	§	
Plaintiff,	§	
	§	C.A. No. 4:21-cv-00464
v.	§	
	§	
Madera Residential Ltd. and Verano Apartment Homes,	§	
	§	
	§	
Defendants.	§	(JURY TRIAL DEMANDED)

PLAINTIFF’S DESIGNATION OF EXPERT WITNESSES

COMES NOW, Angela D. Douglas, Plaintiff in the above-entitled and numbered cause of action, and files her Designation of Expert Witnesses. Further, this designation will serve as supplementation to all Disclosures, Answers to Interrogatories and Responses to Requests for Production and pursuant to the Joint Discovery/Case Management Plan. Plaintiff respectfully asks the Court to accept her expert witness designation as follows:

I. On the issue of Plaintiff’s mental and physical health, anguish and expense, Plaintiff designates:

1. **Dr. Philip Farley**, 4850 West Bellfort Street, Houston, TX 77035. ph:713-723-3135 and/or Memorial Hermann Medical Group, 10780 Westview Drive, #C, Houston, TX 77043, (713)338-6422;
2. **Dr. Melody Moore**, 5445 Almeda Road, #407, Houston, TX 77004. ph: 832- 264-4454; and
3. **LPC Thomas O. Whitehead**, 2237 West Alabama Street, Houston, TX 77098. ph: 713-718-0178.

Health Care Providers with knowledge of the effects that such workplace misconduct (e.g.,

discrimination and retaliation outlined in said suit and charge of discrimination) has had on Plaintiff. They are non-retained experts. They are treating healthcare professionals for Plaintiff. They will testify regarding their treatment of Plaintiff, as well as the procedures and protocol used in treating Plaintiff and gathering evidence related to Plaintiff's claims. They also have knowledge of the medical condition(s) of Plaintiff at the heart of this litigation and the effects and cost that the discrimination and misconduct has/had on Plaintiff. Their opinions are contained within their records.

II. On the issue of reasonable and necessary attorney's fees, costs and other legal expenses, Plaintiff designates:

1. **Scott Newar**, Law Offices of Scott Newar, 440 Louisiana Suite 900, Houston, Texas 77002. ph: 713-226-7950.

Scott Newar will offer testimony regarding the attorney's fees, costs and other legal expenses incurred in the litigation of this matter. Mr. Newar will offer testimony that the attorney's fees, costs, and other legal expenses were both reasonable and necessary. He will base his opinions on his respective skill, training, expertise, and experience in the Southern District of Texas legal community.

To do so, Mr. Newar will have reviewed the attorney's fees invoices, the pleadings, the discovery responses, depositions, and documents produced in this case, among other things.

Mr. Newar's qualifications and background are more fully described on his website, www.newarlaw.com.

WHEREFORE PREMISES CONSIDERED, Plaintiff prays that the court grant this her designation of expert witnesses.

Respectfully submitted,

Law Offices of Katrina Patrick

/s/ Katrina Patrick

Katrina Patrick

Attorney-in-Charge

Federal Bar No. 22038

6575 West Loop South, #500

Bellaire, TX 77401

Telephone: (713) 796.8218

katrina@voiceoftheemployees.com

ATTORNEY FOR PLAINTIFF

Angela D. Douglas

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that Plaintiff's Designation of Expert Witnesses was filed on this 4th day of October 2021, and pursuant to the filing protocols applicable in the United States District Court for the Southern District of Texas, Houston Division, and that service will be further made in compliance with said protocols.

/s/ Katrina Patrick
Katrina Patrick